

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

United States of America,

Case No. 2:24-cr-20667

Honorable Denise Page Hood

Plaintiff,

vs.

D-1 Brian Maurice Brown,

D-2 John Bryant,

D-3 Zion Speed,

D-4 Dominique Glenn,

D-5 Demecko Motton, and

D-6 Akia Brown,

Defendants.

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**First Forfeiture Bill of Particulars**

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The United States, by and through its counsel, submits this First Forfeiture Bill of Particulars, pursuant to Rule 7(f) of the Federal Rules of Criminal Procedure to supplement and clarify the forfeiture allegations contained in the Indictment and to provide notice of specific property the government intends to forfeit upon conviction.

The allegations set forth in the Indictment are re-alleged and incorporated herein by this reference for the purpose of alleging forfeiture pursuant to Federal Rule of Criminal Procedure 32.2(a) and 21 U.S.C. § 853(a) and 18 U.S.C. §

982(a)(1). Upon conviction of either of the offenses set forth in Counts One or Eight of the Indictment, the United States shall seek forfeiture of the following:

- 2008 Ford F-350 Black, XLT DRW, VIN 1FTWW32R28ED00532 (23-DEA-706417)
- 2013 Chrysler 300 Sedan White, VIN 2C3CCARG8DH539093 (23-DEA-706419)
- \$3,000.00 U.S. Currency (25-DEA-717471)
- One (1) Kilo Fine Silver Republic Metals Corporation Bar Purity .999, serial number D1061202 (25-DEA-717472)
- One (1) Kilo Fine Silver Republic Metals Corporation Bar Purity .999, serial number D1068185 (25-DEA-717472)
- One (1) Kilo Fine Silver Republic Metals Corporation Bar Purity .999, serial number D1061196 (25-DEA-717472)
- One (1) Kilo Fine Silver Republic Metals Corporation Bar Purity .999, serial number D1068190 (25-DEA-717472)
- One (1) Kilo Fine Silver Republic Metals Corporation Bar Purity .999, serial number D1061205 (25-DEA-717472)
- One (1) Kilo Fine Silver Republic Metals Corporation Bar Purity .999, serial number D1068180 (25-DEA-717472)
- One (1) Kilo Fine Silver Republic Metals Corporation Bar Purity .999, serial number D1068189 (25-DEA-717472)
- One (1) Kilo Fine Silver Republic Metals Corporation Bar Purity .999, serial number D1068183 (25-DEA-717472)
- One (1) Kilo Fine Silver Republic Metals Corporation Bar Purity .999, serial number D1061199 (25-DEA-717472)

- One (1) Kilo Fine Silver Republic Metals Corporation Bar Purity .999, serial number D1068192 (25-DEA-717472)
- One (1) Kilo Fine Silver Republic Metals Corporation Bar Purity .999, serial number D1061209 (25-DEA-717472)
- One (1) Kilo Fine Silver Republic Metals Corporation Bar Purity .999, serial number D1061197 (25-DEA-717472)
- One (1) Kilo Fine Silver Republic Metals Corporation Bar Purity .999, serial number D1061206 (25-DEA-717472)
- One (1) Kilo Fine Silver Republic Metals Corporation Bar Purity .999, serial number D1068191 (25-DEA-717472)
- One (1) Kilo Fine Silver Republic Metals Corporation Bar Purity .999, serial number D1061201 (25-DEA-717472)
- One (1) Kilo Fine Silver Republic Metals Corporation Bar Purity .999, serial number D1068184 (25-DEA-717472)
- One (1) Kilo Fine Silver Republic Metals Corporation Bar Purity .999, serial number D1061207 (25-DEA-717472)
- One (1) Kilo Fine Silver Republic Metals Corporation Bar Purity .999, serial number D1061203 (25-DEA-717472)
- One (1) Kilo Fine Silver Republic Metals Corporation Bar Purity .999, serial number D1061198 (25-DEA-717472)
- One (1) Kilo Fine Silver Republic Metals Corporation Bar Purity .999, serial number D1061195 (25-DEA-717472)
- One (1) Kilo Fine Silver Republic Metals Corporation Bar Purity .999, serial number D1061200 (25-DEA-717472)

- One (1) Kilo Fine Silver Republic Metals Corporation Bar Purity .999, serial number D1061204 (25-DEA-717472)
- One (1) Kilo Fine Silver Republic Metals Corporation Bar Purity .999, serial number D1068182 (25-DEA-717472)
- One (1) Kilo Fine Silver Republic Metals Corporation Bar Purity .999, serial number D1068193 (25-DEA-717472)
- One (1) Kilo Fine Silver Republic Metals Corporation Bar Purity .999, serial number D1061208 (25-DEA-717472)

This Forfeiture Bill of Particulars is also filed to comply with the provisions of 18 U.S.C. § 983(a)(3), and the government reserves its right to file a civil forfeiture complaint against any of the identified property, if necessary, at the conclusion of this criminal action.

This notice does not limit the government from seeking the forfeiture of additional specific property, including substitute assets, or limit the government from seeking the imposition of a forfeiture money judgment.

Respectfully submitted,

JEROME F. GORGON, JR.  
United States Attorney

S/Adriana Dydell  
Adriana Dydell (CA 239516)  
Assistant U.S. Attorney  
211 W. Fort Street, Ste. 2001  
Detroit, Michigan 48226  
(313) 226-9125  
Adriana.Dydell@usdoj.gov

Dated: May 29, 2025

**Certification of Service**

I hereby certify that on May 29, 2025, the foregoing document was electronically filed using the ECF system which will send notification of such filing to all ECF participants.

S/Adriana Dydell

Adriana Dydell (CA 239516)

Assistant U.S. Attorney

211 W. Fort Street, Ste. 2001

Detroit, Michigan 48226

(313) 226-9125

Adriana.Dydell@usdoj.gov